

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**BESSEMER SYSTEM FEDERAL CREDIT
UNION, on behalf of itself and its members,**

Plaintiff,

vs.

Case No. 2:19-cv-00624-RJC

**FISERV SOLUTIONS, LLC, f/k/a FISERV
SOLUTIONS, INC., and FISERV, INC.,**

Defendants.

**BESSEMER'S UNOPPOSED MOTION TO MODIFY THE DEADLINE
FOR BESSEMER TO SERVE AMENDED RESPONSES TO FISERV'S
DISCOVERY REQUESTS**

Plaintiff Bessemer System Federal Credit Union ("Bessemer") hereby moves for an Order modifying Bessemer's deadline to provide amended responses to Fiserv's requests for production and interrogatories as set forth in the Court's Decision and Order dated August 8, 2023. Fiserv Solutions, LLC, f/k/a Fiserv Solutions, Inc. and Fiserv, Inc. do not oppose this Motion. In support of this Motion, Bessemer states as follows:

1. On June 13, 2023, Special Discovery Master Mark D. Shepard filed a Report and Recommendation regarding the scope of discovery and the Parties' respective motions to compel supplemental interrogatory answers and the production of documents. (ECF No. 209).
2. On August 8, 2023, the Court issued a Memorandum Order adopting the findings set forth in the Special Discovery Master's Report and Recommendation. (ECF No. 220).
3. The Memorandum Order directed Bessemer to provide amended responses to certain of Fiserv's requests for production and interrogatories by August 23, 2023.

4. After conferring in good faith regarding the efficient management of this dispute, and for reasons of judicial efficiency and other good cause, Bessemer hereby respectfully requests that the Court enter an Order: (i) requiring Bessemer to disclose the name of the person or persons who conducted the Security Review and any company or other entity for which that person is employed by August 23, 2023 and (ii) extending the deadline for Bessemer to provide its remaining amended discovery responses pursuant to the Court's August 8, 2023 Memorandum Order to August 30, 2023.

WHEREFORE, Bessemer respectfully requests that the Court enter an Order consistent with this Motion.

Dated: August 21, 2023

Respectfully submitted,

s/ Charles J. Nerko

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